

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COPY

UNITED STATES OF AMERICA)	
)	NO. 04-10358-GAO
v.)	
)	
DAVID M. BEAULIEU,)	
Defendant.)	
)	

GOVERNMENT'S STATEMENT OF RELEVANT FACTS

If this matter had proceeded to trial, the government would have proven the following facts beyond a reasonable doubt:

On September 6, 2004, an Amesbury Police Officer in a marked patrol car attempted to pull over a Chevrolet Blazer, which had been parked behind a Cumberland Farms gas and grocery store in Amesbury, Massachusetts. The officer had run the plates on the vehicle and found that the plates did not match the vehicle to which they were registered. A chase ensued until the Blazer was on a dead-end street, at which point a person in the front passenger's seat jumped out of the vehicle and ran away. This person was subsequently identified as the defendant. The person seen driving the vehicle remained in the Blazer and was later identified as William D. Webb.

The Blazer was then impounded and a vehicle inventory search was conducted. During the search, police officers found what appeared to be counterfeit \$10 notes and one counterfeit \$20 note, all appearing to be United States currency. A subsequent investigation matched the serial numbers on the notes which were found in the Blazer with identical counterfeit notes which had been passed at the Cumberland Farm gas and grocery store prior to the chase.

Surveillance video from the store also revealed the defendant entering the store and making purchases shortly before the chase.

Police investigators then went to the known residence of the defendant, who answered the door. After being advised of his Miranda rights, the defendant told police that he had both passed the notes in question at the Cumberland Farms store AND that he had manufactured those counterfeit notes, using his Hewlett Packard scanner / copier machine. Mr. Beaulieu then told police that he had other notes there under the scanner and told the police that they could look around if they wished. The police then found, under or around the scanner, eleven \$20 counterfeit notes, all of which bore the same serial number and which Mr. Beaulieu then identified as counterfeit. Following his arrest, the defendant admitted that he had both manufactured and passed counterfeit United States currency in both \$10 and \$20 notes.

Mr. Beaulieu further described his involvement in manufacturing and passing counterfeit United States currency, including his recent printing of \$100 notes on his scanner / copier and that he had passed such notes to other individuals for the purpose of purchasing cocaine. All told, Mr. Beaulieu admitted having manufactured approximately \$5,300.00 in counterfeit currency.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

Paul R. Moore
Assistant United States Attorney

DATE: May 1, 2006

Certificate of Service

The undersigned hereby informs the Court and certifies that this Statement of Relevant Facts, pertaining to the Plea Hearing, has been provided this day to counsel for the defendant and to the United States Probation Office.

/s/ Paul R. Moore

Paul R. Moore

Assistant United States Attorney

DATE: May 1, 2006